

REMARKS

This paper is responsive to a *final* Office action dated September 17, 2007. Claims 1-22 were examined. Claims have been amended and new claim 23 has been added.

Claim Rejections under 35 USC § 103

Claims 3-22 were rejected under 35 U.S.C. § 103(a) as being unpatentable over U.S. Patent No. 7,124,295 to Zhao (hereinafter “*Zhao*”) in view of U.S. Patent No. 7,051,204 to Pitsos (hereinafter “*Pitsos*”). In framing the rejection of independent claim 3, the Office relies on *Zhao* for disclosure of an update to a local certificate revocation list (CRL) state by application of a delta CRL to produce a resultant local CRL state. Unfortunately, the Office then goes on to attribute to *Zhao* and *Pitsos*, disclosure that simply does not appear in either reference.

In particular, while the Office properly acknowledges that *Zhao* does not disclose (i) receiving such a first hash value computed as a function of a resultant state computable by applying the delta CRL to the CRL(t) state, (ii) computing a second hash value as a function of a resultant local CRL state or (iii) comparing such second and first hash values, it errantly attributes such disclosure to *Pitsos*. With respect, Applicant must point out that *Pitsos* does not disclose that which the Office attributes to it. In particular, *Pitsos*’ disclosure is limited to hash values corresponding to public keys and comparison of meta hash values (*i.e.*, hashes of lists of hash values) received from to different hash value servers. Thus, relative to the subject matter claimed, *Pitsos* does not involve the use of hash values computed as a function of a resultant state. In short, Office misinterprets *Pitsos*. The rejections based thereon are without factual basis and cannot be sustained for at least this reason.

While the scope of claim 3 is properly expressed in terms of delta CRLs and hashes, the specific subject matter claimed is neither disclosed nor suggested by *Zhao* or *Pitsos*, whether taken alone or in combination. Simply stated, a sustainable rejection under § 103 requires more than just random usage of the two terms.

More specifically, the claims clearly recite the computation of a hash value that is a function of at least a subsequent CRL state to which a given delta CRL corresponds. Unlike a simple hash of a delta coding itself, a hash on the resultant state or (as in some embodiments) on

both a prior and a resultant state is not vulnerable to certain failure modes such as out of order update or update application to an inappropriate base state. Thus, even leaving aside whether or not *Zhao*'s multiple-update-spanning deltas correspond Applicant's delta CRLs, *Pitsos*' use of a hash is inapposite. In particular, *Pitsos*' fingerprint or hash is computed over a data unit for which authenticity is to be established. In contrast, Applicant's claims recite a hash computed not over a list of hash values (as in *Pitsos*) or over a delta CRL itself (as nowhere disclosed, but errantly asserted by the Office), but rather over a subsequent CRL state that would result from proper application of the delta CRL to a proper base state. *Pitsos* simply does not disclose or suggest a hash generated based on a resultant state.

While *Pitsos*' hash is used to assure authenticity of a list of hashes of public keys, it does not validate proper application of a delta CRL to a proper base CRL to produce the expected resultant CRL. Because of disclosure of a hash that is a function of at least resultant CRL state is entirely absent from either reference, no *prima facie* case of obviousness is supportable based on *Zhao* and *Pitsos*.

Furthermore, even leaving aside the above-identified deficiencies, the particular combination of teachings proposed by the Office would not have been obvious to a person of skill in art since *Pitsos*' use of a hash would be entirely duplicative of *Zhao*'s own use of a digitally signed delta CRL. Specifically, a person of skill in the art would not have been motivated to draw from *Pitsos* a feature already provided for in *Zhao*. In short, even leaving aside the absence of disclosure for a hash of the particular type recited (i.e., hash on a *resultant* state), the Office's theory of obviousness necessarily and impermissibly relies on a combination motivated by applicant's own claims and disclosure rather than any teaching, suggestion or motivation contained in the references themselves or more generally in the art.

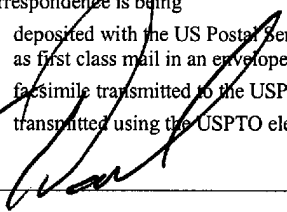
For at least the preceding reasons, claim 3 and those dependent therefrom (i.e., claims 4-10) are all allowable and a notice to that effect is respectfully requested. Although independent claims 11, 16 and 21 and those dependent therefrom are of different scope, they are allowable for at least analogous reasons.

Finally, Applicant notes that, with respect to rejections of the dependent claims, some of the Office's factual assertions are also inconsistent with actual content of the applied references.

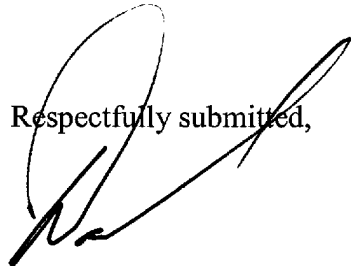
In particular, the Office's assertion that *Pitsos* discloses hash values computed as a function of **both** respective prior and resultant CRL states from which an associated delta CRL is derived is, in a word, *imagined*. Nothing in the applied references supports the Office's "factual" position with respect to rejections of claims. The rejections are unsustainable and should be withdrawn.

Conclusion

In summary, claims 1-23 are in the case. All claims are believed to be allowable over the art of record, and a Notice of Allowance to that effect is respectfully solicited. Nonetheless, if any issues remain that could be more efficiently handled by telephone, the Examiner is requested to call the undersigned at the number listed below.

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Respectfully submitted,


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